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*Attorney for Alejandra Enriquez-Atunez*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALEJANDRA ENRIQUEZ-ATUNEZ,

Defendant.

CASE NO. 2:21-CR-00169-CDS-BNW

**UNOPPOSED MOTION FOR TRAVEL  
OUTSIDE THE DISTRICT OF NEVADA**

COMES NOW, Defendant, Alejandra Enriquez-Atunez, and hereby respectfully requests this Honorable Court issue an Order granting Defendant leave to travel outside the state of Nevada to Los Angeles, CA, on June 25, 2022 through June 26, 2022 for the purpose of taking her daughters to the Universal Studios theme park.

To date, Ms. Enriquez-Atunez has been compliant with all terms of her supervised release. Ms. Enriquez-Atunez has booked one night at the Hollywood Motel 6 located at 1738 Whitley Avenue, Los Angeles, CA 90028 where they will stay during the trip. Ms. Enriquez-Atunez is requesting permission to travel out of the jurisdiction with her two daughters for the two-day trip and will return to Las Vegas the evening of June 26, 2022 (all travel will be via vehicle).

The Defense has spoken to both Pre-Trial Services Officer Mariah Bassler-Wide and

1 AUSA Kimberly Sokolich regarding the request. AUSA Sokolich advised she would defer to Pre-  
2 Trial Services and Officer Bassler-Wide has no objection to this request, so long as the  
3 documentation for the address where they will be staying overnight is provided (in addition to the  
4 hotel address being provided in this motion, documentation of the hotel booking was provided to  
5 Officer Bassler-Wide). For these reasons, Ms. Enriquez-Atunz respectfully requests the Court  
6 grant her Unopposed Motion for Travel from the period of June 25, 2022 through June 26, 2022.  
7

8 Dated this 21<sup>st</sup> day of June, 2022.  
9  
10

11 Respectfully submitted,  
12

13 /s/ Jacqueline Tirinnanzi  
14 JACQUELINE TIRINNANZI, ESQ  
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17 Henderson, NV 89012  
18 Telephone: 702.463.9074  
19 Attorney for Defendant  
20 Alejandra Enriquez-Atunz

21 **ORDER**

22 **IT IS SO ORDERED**

23 **DATED:** 2:12 pm, June 22, 2022

24 

25 **BRENDA WEKSLER**  
26 **UNITED STATES MAGISTRATE JUDGE**  
27  
28

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**CERTIFICATE OF SERVICE**

I certify that I am an Attorney of Counsel at KATHLEEN BLISS LAW PLLC and that  
on this 21st day of June 2022, I did cause a true copy of:

**UNOPPOSED MOTION FOR TRAVEL OUTSIDE THE DISTRICT OF NEVADA**

To be served via electronic service by the U.S. District Court CM/ECF system to the parties on  
the Electronic Filing system in this action.

By: /s/ Jacqueline Tirinnanzi  
An Attorney of Counsel at  
KATHLEEN BLISS LAW

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